

RE: Notice of Charging Lien (Kaye v. H + H et. al. 18-12137)

Thomas Ricotta <TRicotta@RicottaAndMarks.com>

Thu 7/7/2022 11:52 AM

To: SPECIAL HAGAN <special@haganlawoffices.net>;

Cc: Melissa Kaye <melissakayemd@gmail.com>;

Received. As I previously indicated, I am open to having discussion regarding a resolution of this, and discussing same with my client, but I need some of the information requested from you in order to be able to advise her.

To that end, if you can advise me if you believe you are presently entitled to any fees, and, if so, what document you believe is controlling that would presently entitle you to outstanding fees, as opposed to asserting your lien on any settlement or recovery, should one occur, that would aid me in being able to guide Dr. Kaye on your position.

Sincerely,

Thomas Ricotta

****PLEASE NOTE OUR NEW ADDRESS****

Ricotta & Marks, P.C.

24-11 41st Avenue, Second Floor

Long Island City, New York 11101

(347) 464-8694

From: SPECIAL HAGAN <special@haganlawoffices.net>

Sent: Thursday, July 7, 2022 11:47 AM

To: Thomas Ricotta <TRicotta@RicottaAndMarks.com>

Cc: Canfield, Donna (Law) <dcanfiel@law.nyc.gov>; Melissa Kaye <melissakayemd@gmail.com>

Subject: Notice of Charging Lien (Kaye v. H + H et. al. 18-12137)

Importance: High

Dear Mr. Ricotta,

Please see attached.

Sincerely,

Special Hagan (her/she/Ms.)

Law Offices of Special Hagan, Esq.

88-08 Justice Avenue Apt. 16i

Elmhurst, New York 11373

p: (917) 337-2439

fax: (914) 462-4137

*Note new address

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—THE LAW OFFICES OF—

Special | Hagan

88-08 JUSTICE AVENUE APT. 16I
ELMHURST, NEW YORK 11373
P: (917) 337-2439
FAX: (914) 462-4137

July 7, 2022

VIA EMAIL

Thomas Ricotta, Esq.
Ricotta & Marks P.C.,
24-11 41st Avenue, Second Floor
Long Island City, New York 11101

RE: Kaye v. NYC Health & Hospital Corp. et. al.
Index No.: 18-cv-12137

Dear Mr. Ricotta:

I write to advise you and your client that, pursuant to Judiciary Law § 475, that I possess a charging lien against any proceeds, whether through settlement or judgment, due Plaintiff. As such, if the parties reach a settlement, I request that you provide me any such Settlement Agreement as you as plaintiff's current counsel, reach to insure that my lien is protected.

I hope that Ms. Kaye and I will be able to agree on the amount of the my lien, if not, I will move the Court for an Order determining the amount of the my lien. Regardless, neither you nor your client are to disburse the settlement proceeds without regard to the monies due and owed to me.

Thank you for your attention to these matters. If you wish to discuss these or any other matters, please contact me.

Very truly yours,

/s/

Special Hagan, Esq.

cc: Melissa Kaye, M.D. (via email)
Donna Canfield, Esq. (via e-mail)